

HONORABLE MARSHA J. PECHMAN

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

NORTHSHORE SHEET METAL, INC.,

Plaintiff,

v.

SHEET METAL WORKERS
INTERNATIONAL ASSOCIATION,
LOCAL 66,

Defendant.

No. 2:15-CV-01349 MJP

**DECLARATION OF TIM CARTER IN
SUPPORT OF DEFENDANT'S
RESPONSE TO PLAINTIFF'S MOTION
TO QUASH OR MODIFY SUBPOENAS
DUCES TECUM**

Tim Carter makes the following declaration:

1. I am the Business Manager of Sheet Metal Workers International Association, Local 66 ("Local 66").

2. Northshore Sheet Metal, Inc. ("Northshore") and Local 66's collective bargaining agreement ("CBA") expired on June 1, 2015. Upon expiration of the CBA, the Union had the right to strike.

3. The parties began bargaining for a successor CBA on May 12, 2015.

DECLARATION OF TIM CARTER IN
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TO PLAINTIFF'S MOTION TO QUASH OR
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1 4. At the May 25, 2015 bargaining session, I stated to Jeff Meyer, Northshore's co-
2 owner, that the Union would not agree to Northshore's request to extend the CBA because the
3 Union would not waive its right to strike.

4 I declare under penalty of perjury of the laws of the State of Washington that the foregoing
5 is true and correct to the best of my knowledge and belief.

6 SIGNED in Seattle, Washington this 6th day of January, 2016.

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10 Tim Carter
11 Business Manager
12 Sheet Metal Workers International
13 Association, Local 66

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25 DECLARATION OF TIM CARTER IN
SUPPORT OF DEFENDANT'S RESPONSE
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